CONESTOGA-ROVERS
& ASSOCIATES

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May 12, 2010

Reference No. 056393

Mr. Michael Berkoff
Remedial Project Manager
U.S. Environmental Protection Agency - Region V
Superfund Division, Remedial Response Section #2
77 West Jackson Boulevard (SR - 6J)
Chicago, Illinois 60604 - 3590

Dear Mr. Berkoff:

Re: Remedial Action Design Specification Variance - Silt Fence
12th Street Landfill Operable Unit No. 4
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Allegan and Kalamazoo County

As discussed during the Pre-Construction meeting held on May 6, 2010, Conestoga-Rovers & Associates (CRA) has prepared this letter, on behalf of Weyerhaeuser Company, to request a variance to Section 01571 - Temporary Erosion and Sediment Control of the design specifications, included as part of the Final Design Report approved by the United States Environmental Protection Agency (U.S. EPA) on March 25, 2010. The request for variance pertains to the silt fence design specification.

As part of the selected Remedial Action (RA) implementation, only a limited supply of the specified silt fence has been located, and therefore, an alternative to the specified silt fence is required, in order to complete the installation of the erosion and sedimentation controls and proceed with the implementation of the RA.

As specified in Section 01571- Subsection 1.8 - Products, the approved silt fence material consists of the following:

1. An assembled, ready to install unit consisting of geotextile attached to drivable posts.
2. Geotextile: Uniform in texture and appearance with no defects, flaws, or tears that would affect its physical properties and contains sufficient ultraviolet ray inhibitor and stabilizers to provide a minimum 2-year service life from outdoor exposure.
3. Net Backing: An industrial polypropylene mesh which is joined to the geotextile at both top and bottom with double stitching of heavy-duty cord. Width of netting: minimum of 3 feet.
4. Posts: Sharpened wood approximately 2 inches square protruding below the bottom of geotextile to allow a minimum of 1 1/2 foot embedment. Post spacing not to exceed 8 feet. Securely fasten each

post to the geotextile and net backing by staples suitable for such purpose.

5. Meeting the ASTM International (ASTM) Standard 6461.

The specified silt fence is to be installed in accordance with the Erosion and Sediment Control (ESC) Plan (Drawing C-03) and ASTM D6462. The erosion and sedimentation controls include a double row of silt fence installed along the north and west boundaries of the Site work area, adjacent to the asphalt property and wetland areas. Along the east and south boundaries of the work area, only a single row of silt fence was required.

Based on total quantity of silt fence required in the ESC plan, the limited available quantity of the specified silt fence will be insufficient. To supplement this shortage, CRA proposes to use an alternative type of silt fence, in combination with the limited specified silt fence, to meet the requirements of the ESC Plan.

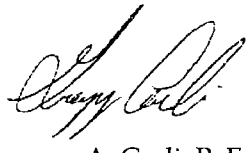
The proposed alternative silt fence is manufactured in Willacoochee, Georgia and the product is referred to as "Willacoochee 1210". This material is listed on the Qualified Materials List of the 2003 Michigan Department of Transportation (MDOT) Standard Specification for Construction and may be used on any MDOT construction project. In meeting the MDOT specifications, the alternative silt fence will also comply with the Allegan County Soil Erosion and Sedimentation Control Ordinance (Ordinance #1013.1).

The currently specified silt fence would be installed as the inner layer (closest to the landfill toe of slope and primary work area), located to the north and west of the Site work area. The alternative silt fence would be installed as the outer layer to the north and west, on the asphalt and wetland properties and along the east and south boundaries of the Site. To increase the rigidity of the alternative silt fence, CRA will install the alternative silt fence in accordance with ASTM D6462, **however, stakes will be placed with a maximum spacing of 6 feet, instead of the specified 8 to 10 feet, to provide additional support.**

Should you have any questions or require any additional information, please do not hesitate to contact the undersigned.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES



Gregory A. Carli, P. E.

AS/cs/18
Encl.

c.c.: J. Saric (U.S. EPA) - electronic only
L. Kirby-Miles (U.S. EPA) - electronic only
S. Chummar (U.S. EPA) - electronic only
T. Prendiville (U.S. EPA) - electronic only
S. Borries (U.S. EPA) - electronic only
R. Frey (U.S. EPA) - electronic only
S. Hutsell (CH2MHILL) – electronic only
P. Bucholtz (MDNRE) – three hard copies
K. Zakrzewski (MDNRE) - electronic only
R. Gay (Weyerhaeuser) – electronic only
M. Lebo (Weyerhaeuser) - electronic only
J. Jackowski (Weyerhaeuser) - electronic only
M. Erickson (Arcadis) - electronic only
D. Penniman (Arcadis) – electronic only
G. Griffith (Georgia-Pacific LLC) – electronic only
J. Keiser (CH2M Hill) - electronic only
J. Dembowske (CRA) – electronic only
A. Stadnyk (CRA) – electronic only